COURTNEY M. PRICE VICE PRESIDENT CHEMSTAR



December 18, 2003 201-14932

By Mail
Mike Leavitt, Administrator
U.S. EPA
P.O. Box 1473
Merrifield, VA 22116

OPPT CBIC

Attn: Chemical Right-to-Know Program – Test Plan Submission from HERTG Registration Number

Dear Administrator Leavitt:

The American Chemistry Council Petroleum Additives Panel Health, Environmental, and Regulatory Task Group (HERTG) submits for review and public comment its test plan report, as well as related robust summaries, for the single chemical, Nitric Acid, 2-Ethylhexyl Ester, (CAS #: 27247-96-7), under the Environmental Protection Agency's High Production Volume (HPV) Chemical Challenge Program. The HERTG understands that there will be a 120-day review period for the test plan report and that all comments generated by or provided to EPA will be forwarded to the HERTG for consideration.

Thank you in advance for your attention to this matter. If you have any questions regarding the test plan report or the robust summaries, or HERTG's activities associated with the Challenge Program, please contact Sarah McLallen at 703-741-5607 (telephone), 703-741-6091 (telefax) or Sarah_McLallen@americanchemistry.com (e-mail).

Sincerely yours,

cc: HERTG members



Resnousible Cares

201-14932A

HIGH PRODUCTION VOLUME (HPV)

CHALLENGE PROGRAM

OPENT CRIC

TEST PLAN

For

Nitric Acid, 2-Ethylhexyl Ester

Prepared by
The American Chemistry Council
Petroleum Additives Panel
Health, Environmental, and Regulatory Task Group

December 2003

LIST OF MEMBER COMPANIES IN THE HEALTH, ENVIRONMENTAL AND REGULATORY TASK GROUP

The Health, Environmental, and Regulatory Task Group (HERTG) of the American Chemistry Council Petroleum Additives Panel include the following member companies:

Chevron Oronite Company, LLC

Crompton Corporation

Ethyl Corporation

Groupe SNPE

ExxonMobil Chemical Company

Ferro Corporation

Infineum

The Lubrizol Corporation

Rhein Chemie Corporation

Rhodia, Inc.

1.0 INTRODUCTION

In March 1999, the American Chemistry Council (formerly the Chemical Manufacturers Association) Petroleum Additives Panel Health, Environmental, and Regulatory Task Group (HERTG), and its participating member companies committed to address certain chemicals listed under the Environmental Protection Agency (EPA) High Production Volume (HPV) Chemical Challenge Program. This test plan follows up on that commitment. Specifically, this test plan sets forth how the HERTG intends to address testing information for the following substance: Nitric Acid, 2-Ethylhexyl Ester (2-EHN) (CAS No.: 27247-96-7)

In preparing this test plan the following steps were undertaken:

Step 1: A review of the literature and confidential company data was conducted on the physicochemcial properties, mammalian toxicity endpoints, and environmental fate and effects for 2-EHN, using its CAS number, CAS name, and synonyms. Searches included the following sources: MEDLINE, BIOSIS, CANCERLIT, CAPLUS, CHEMLIST, EMBASE, HSDB, RTECS, EMIC, and TOXLINE databases; the TSCATS database for relevant unpublished studies on these chemicals; and standard handbooks and databases (e.g., Sax, CRC Handbook on Chemicals, IUCLID, Merck Index, and other references) for physicochemical properties.

Step 2: The compiled data was evaluated for adequacy in accordance with the EPA guidance documentation.

2.0 GENERAL SUBSTANCE INFORMATION

The substance that is the subject of this test plan is used as a fuel additive in diesel fuels. The chemical name, CAS Registry Number, molecular weight and chemical structure for this substance are presented below.

Chemical Name: Nitric acid, 2-ethylhexyl ester (2-EHN)

Chemical Abstract Service Registry Number: 27247-96-7

Molecular Weight: 175.2 g/mol

Chemical Structure: CH₂-O-NO₂ | CH₃CH₂-CH-CH₂CH₂CH₂CH₃

3.0 EXPOSURE INFORMATION

Manufacture

A 50/50 mixture of undiluted Nitric and Sulfuric Acids is fed to a reaction tank along with a stiochiometric amount of 2-Ethylhexanol. The formation of the 2-EHN is almost instantaneous.

The reaction equation is as follows:

C8H17OH + HNO3 + (H2SO4) -----> C8H17NO3 + H2O + (H2SO4) + H = 12 kcal/g mole

Any residual water is removed by passing the material through alumina bead dryers. The final 2-EHN product is then filtered and sent to storage.

Use

2-EHN is used as an ignition improver additive in diesel fuels to raise the cetane number.

4.0 PHYSICOCHEMICAL PROPERTIES

4.1 Summary of Available Data

Chemical and physical properties compiled by an industry consortium for 2-EHN are listed below. These data are drawn from technical data sheets, material data sheets, and IUCLID submissions.

Flash point >70°C (closed cup)

Freezing point <-45°C

Boiling point >100°C (decomposes)

Vapor pressure

Vapor pressure

Vapor pressure

40-53 Pa @ 20°C

40-53 Pa @ 40°C

1.33 kPa @ 82°C

Density

0.96 g/ml @ 20°C

Solubility in water

12.6 mg/L @ 20°C

Lower explosive Limit 0.25% v/v in air (literature value – source u

Decomposition temperature 100°C

4.2 Data Assessment and Test Plan for Physicochemical Properties Relevant to Environmental Fate

2-EHN is a liquid at ambient temperatures (thus melting point is not-applicable). This substance undergoes a self-accelerating decomposition reaction if heated above 100°C. This exothermic reaction can become extremely violent and can ultimately end in an explosion. Therefore, the boiling point of this substance is not applicable. The vapor pressure of 2-EHN is 27 Pa @ 20°C, the water solubility is 12.6 mg/L @ 20°C. The octanol/water partition coefficient of 2-EHN has been reported to be 4.1. However no test report is available. Therefore, this parameter will confirmed by QSAR modeling.

5.0 ENVIRONMENTAL FATE DATA

5.1 Biodegradability

5.1.1 Summary of Available Data

No adequate reliable published or unpublished biodegradation data on 2-EHN were located.

5.1.2 Data Assessment and Test Plan for Biodegradability

Biodegradation testing will be conducted.

5.2 Hydrolysis

5.2.1 Summary of Available Data

2-EHN was shown to hydrolyze in each of the pH conditions tested (pH 4, 7 and 9 at 25 and 50 $^{\circ}$ C). The mean half-life of the compound and water reaction at 25 $^{\circ}$ C ranged from 370 hours (pH 4.0) to 108 hours (pH 9.0)

5.2.2 Data Assessment and Test Plan for Hydrolysis

Hydrolysis testing will not be conducted.

5.3 Photodegradation

5.3.1 Summary of Available Data

No adequate published or unpublished photodegradation studies were located for 2-EHN.

5.3.2 Data Assessment and Test Plan for Photodegradation

The Atmospheric Oxidation Potential (AOP) of this substance will be characterized using the modeling program AOPWIN.

5.4 Fugacity Modeling

5.4.1 Summary of Available Data

There is no published or unpublished fugacity-based multimedia fate modeling data for 2-EHN.

5.4.2 Test Plan for Fugacity

The relative distribution of 2-EHN among environmental compartments will be evaluated using Level I Fugacity modeling.

6.0 ECOTOXICOLOGY DATA

6.1 Aquatic Ecotoxicity Testing

6.1.1 Summary of Available Data

2-EHN was evaluated for aquatic toxicity in fish, invertebrates and algae. In an acute aquatic toxicity study, conducted in Zebra fish, the 24, 48, 72 and 96 hour LC50s were >12.6 mg/L. In an acute daphnia study, the 24 and 48 hour EC50s were >12.6 mg/L. The 24 and 48 hour daphnia NOECs were >10 mg/L. In an acute algae toxicity test, the 72-hour no observed effect concentration, based on growth rate and growth inhibition, was 12.6 mg/L.

6.1.2 Data Assessment and Test Plan for Acute Aquatic Ecotoxicity

Adequate and reliable acute aquatic fish, invertebrate and algae toxicity studies were performed with 2-EHN. Additional aquatic ecotoxicity testing will not be conducted.

7.0 MAMMALIAN TOXICOLOGY DATA

7.1 Acute Mammalian Toxicity

7.1.1 Summary of Available Data

Acute oral and dermal toxicity studies are available for 2-EHN . In these studies, the LD_{50} was greater than 10 mL/kg by the oral route and greater than 5 mL/kg by the dermal route indicating a low concern for toxicity.

7.1.2 Data Assessment and Test Plan for Acute Mammalian Toxicity

Adequate and reliable acute oral and dermal toxicity tests were performed for 2-EHN. Additional acute mammalian toxicity testing will not be conducted.

7.2. Mutagenicity

7.2.1 Summary of Mutagenicity Data

A negative Salmonella typhimurium point mutation assay is available for 2-EHN.

7.2.2 Data Assessment and Test Plan for Mutagenicity Toxicity

An adequate and reliable *Salmonella typhimurium* point mutation assay is available for 2-EHN. A chromosomal aberration study will be conducted on 2-EHN.

7.3 Repeated-dose, Reproductive and Developmental Toxicity

7.3.1 Summary of Repeated-Dose Toxicity Data

2-EHN has been evaluated in two inhalation toxicity studies in rats (two weeks duration followed by 2-week recovery periods), in a 21 day dermal toxicity study in rabbits and in a 28

day oral toxicity study in rats. The no observed effect levels in the inhalation, dermal and oral toxicity studies were 42 ppm, >500 mg/kg (systemic) and 20 mg/kg respectively. There were no published or unpublished reproductive or developmental toxicity tests located for 2-EHN.

7.3.2 Data Assessment and Test Plan for Repeated-dose Toxicity

Adequate and reliable inhalation, dermal and oral repeat dose toxicity studies are available for 2-EHN. Additional repeat dose toxicity studies will not be conducted. A reproduction/developmental toxicity study will be conducted.

8.0 SUMMARY

The following table summarizes the available data and proposed testing on 2-EHN .Table 1 Summary Table of Available Data and Proposed Testing on

Nitric Acid, 2-Ethylhexyl Ester

CAS No.: 27247-96-7	47-96-7 Study Results	
Physical/Chemical		Proposed
Characteristics		
Melting Point	Not Applicable	No
Boiling Point	Not Applicable (violently decomposes)	No
Vapor Pressure	27 Pa @ 20°C	No
Water Solubility	12.6 mg/L @ 20°C	No
Partition Coefficient	4.1	Yes
Environmental Fate		
Biodegradation	No Adequate Data Located	Yes
Hydrolysis	Hydrolysis occurred under all conditions evaluated.	No
Photodegradation	No Data Located	Modeling
Fugacity	No Data Located	Modeling
Ecotoxicity		
Acute Toxicity to Fish	24, 48, 72 and 96 hour LC50s: >12.6 mg/L	No
Acute Toxicity to Invertebrates	24 and 48 hour EC50s: >12.6 mg/L 24 and 48 hour NOEC: >10 mg/L	No
Acute Toxicity to Algae	72 hour NOEC: 12.6 mg/L	No
Mammalian Toxicity		
Acute Toxicity	Oral LD50: >10 mL/kg (rat) Dermal LD50: >5 mL/kg (rabbit)	No
Repeated Dose Toxicity	14 Day Inhalation NOEL: 42 ppm 21 Day Dermal NOEL: >500 mg/kg (systemic) 28 Day Oral NOEL: 20 mg/kg/day	No
Developmental Toxicity	No Adequate Data Located	Yes
Reproductive Toxicity	No Adequate Data Located Ye	
Genotoxicity	•	
Gene Mutation	Not Mutagenic	No
Chromosomal Aberration	No Adequate Data Located Y	

201-14932B

Substance Group:

Nitric Acid, 2-Ethylhexyl Ester

Summary prepared by:

Petroleum Additives Panel

Health & Environmental Research Task Group

RECEIVED
OPPT OBIC

1. Environmental Fate and Pathways

1.2. Hydrolysis

Robust Summary 18-Hydro-1

CAS No.	CAS# 27247-96-7
Test Substance Name	Nitric acid, 2-ethylhexyl ester
Method/Guideline	EC Method C7
GLP	Yes
Year	1998
Remarks for Test Conditions	The test substance was dissolved in aqueous media buffered at pH 4, 7 and 9. The concentration of the test substance was determined as a function of time. The logarithms of the concentrations are plotted against time and the slope of the line used to calculate the rate constant. The concentrations in the test solution were determined by a gas chromatographic method using mass spectrometric detection.
	The test substance was used as the analytical standard. Buffer solutions included: pH 4 – phthalate buffer; pH 7 – phosphate buffer; pH 9 – borate buffer. Buffer solutions were incubated in the water bath at the test temperature and their pH adjusted to the nominal value. The test solution was prepared by adding the test material in methanol to the buffer solution to give a final test material concentration of 6 mg/L and a final methanol concentration of approximately 1%.
	The study was conducted in borosilicate glass bottles with minimal headspace closed with Teflon lined screw caps.
	The study was conducted in two phases as follows: Phase I – the test material solution prepared at pH 4, 7 and 9 at 6 mg/L and incubated at 50 °C. Analysis conducted over several time points. Results obtained at 2.4 hours and 5 days (extrapolated) were used to determine if additional testing was necessary. Phase II - the test material solution prepared at pH 4, 7 and 9 at 6 mg/L and incubated at 25 °C. Analysis conducted over several time points. This test was run in duplicate.
	The logs of the concentration of the test material in the different buffers incubated at 50 °C were plotted against incubation time and fitted to linear regression curves with good coefficients of correlation for each pH. The observed rate constant of the reaction was calculated from the slope for each pH (k obs = slope x 2.303). Reaction half-life was

	calculate	$ed (t_{1/2} = 0.693/$	(k _{obs}).		
Results	1	erved rate consere as follows:	tants and	reaction hal	f lives at 50 and
	pН	Rate Constant (min ⁻¹) (50 °C)	Half Life (mins) (50 °C)	Rate Constant (hour ⁻¹) (25 °C)	Half Life (hours) (25 °C)
	4.0	0.0005657	1225	0.001874 0.002875	370 241
	7.0	0.0004698	1475	0.004405 0.008664	157 80
	9.0	0.0004072	1702	0.004695 0.006441	148 108
	The duplicate value at pH 7, 25 °C was excluded.				
	condition mean hal	ns tested follow	ving a pse drolysis	eudo-first ord reaction at 2	each of the pH der reaction. The 5°C ranged from
Conclusions	The test material was shown to hydrolyze in each of the pH conditions tested following a pseudo-first order reaction. The mean half-life of the compound and water reaction at 25°C ranged from 370 hours (pH 4.0) to 108 hours (pH 9.0).				
Data Quality	Reliable without restriction (Klimisch Code)				
References	Confidential Business Information				
Other	Updated:	: 11/11/2003			

2. Ecotoxicity

AQUATIC ORGANISMS

2.1 Acute Toxicity to Fish

Robust Summary 18-Fish Tox -1

Test Substance	
CAS#	27247-96-7
Chemical Name	Nitric acid, 2-ethylhexyl ester
Remarks	Test material purity: 99.9%
Method	
Method/Guideline	OECD Guideline for Testing of Chemicals #203, Fish Acute Toxicity Test
followed	(1992).
Test Type	Acute Toxicity to Fish (Static test)
GLP (Y/N)	Y
Year (Study Performed)	1998
Species/Strain	Zebra fish (Danio rerio)
Fish Number	10/concentration
Fish Size	Average length 2.67 cm (2.4-3.0 cm); Biological loading 0.3 g/L
Analytical Monitoring	Not performed
Nominal Test Substance Concentration Levels	Control, 1, 10 and 12.6 mg/L (12.6 mg/L is the limit of solubility)
Test Concentration Preparation	Appropriate amounts of the test material were added directly to the experimental water (4 liters). Both the mid and high concentrations were subjected to slight continuous stirring (<20 rpm).
Exposure Period	96 hours
Exposure Conditions	Static (non-renewal test) conditions.
Vehicle	None
Statistical Analysis	None required based on the results.
Dose Rangefinding Study	No
Test Chambers	4-liter tank containing 4 liters of test solution
Diluent Water	Reverse osmosis tap water
Test Solution Water	Conductivity: 200 umhos/cm
Chemistry During Exposures	Dissolved Oxygen: 100-118% of dissolved air saturation value

	pH: 6.46-6.83			
	Hardness: 90 mg/L CaCO ₃			
Photoperiod	12-h light per day			
Temperature Range	21.1-22.3°C			
Positive Control	No			
Remarks field for test conditions	Pretreatment: none, fish held for a minimum of 12 days before testing. No feeding 48 hours prior to and during the test. All organisms were observed for mortality and clinical signs of toxicity or abnormal behavior at 2, 24, 48, 72, and 96 hours after initiation of test material exposure.			
Results	Cumulative mortality at study termination (96 hours) was as follows:			
	Test Substance Concentration (mg/L) Cumulative % Mortality Mortality			
	1.0 10 3 30			
	10.0 10 2 20			
	12.6 10 1 10			
	No undissolved test material was seen on the surface of the test vessels during the study.			
Conclusions	The 24, 48, 72 and 96 hour LC50s were >12.6 mg/L.			
Data Quality	Reliable with restriction, restriction due to the lack of analytical confirmation of dose concentration.			
References	Unpublished confidential business information			
Other	Updated: 11/06/2003			

2.2 Acute Toxicity to Invertebrates

Robust Summary 18-Daph-1

Test Substance	
CAS#	27247-96-7
Chemical Name	Nitric acid, 2-ethylhexyl ester
Remarks	Test material purity: 99.9%
Method	
Method/Guideline followed	OECD Guideline for Testing of Chemicals #202 <i>Daphnia</i> sp. Acute Immobilization Test and Reproduction Test (1984), EEC Directive 92/69-Method C.2 (1992).
Test Type	Static (non-renewal) acute toxicity test
GLP (Y/N)	Y
Year (Study Performed)	1998
Species/Strain	Daphnia magna
Analytical Monitoring	None
Exposure Period (unit)	48 hours
Statistical methods	None required based on results.
Remarks field for test conditions (fill as	Juvenile daphnids less than 24-hours old were produced from laboratory in-house culture.
applicable)	Appropriate amounts of the test material were added directly to the dilution water and stirred for 10 to 14 minutes.
	Twenty daphnids, less than 24 hours old were distributed into each concentration (50 mL/chamber)(5 daphnids/replicate). Daphnids were not fed during exposure. Control test chambers were handled in an identical fashion.
	Light cycles were maintained at 12-hours of light per day. Test solutions were maintained at 19.3-19.9°C.
	Dilution water was prepared according to the guideline and contained 200 mL demineralized water and 800 mL natural water.
Test Concentrations	Control, 1, 10 and 12.6 mg/L (12.6 mg/L is the limit of solubility)
Results	
Remarks	Water chemistry: Dissolved oxygen: 8.4 – 8.7 mg/L; pH: 7.65 – 7.80
	100% survival occurred in all control, 1 and 10 mg/L test vessels. At 12.6 mg/L 30% immobilization was observed at 24 hours and 20% immobilization was noted at 48 hours. The 24 and 48-hour EC50 values were both >12.6 mg/L. The 24 and 48 hour NOEC was 10 mg/L.

Conclusions	The 24 and 48-hour EC50s were >12.6 mg/L. The 24 and 48 hour
	NOEC was 10 mg/L.
Data Quality	Reliable with restriction, restriction due to the lack of analytical confirmation of dose concentration.
References	Unpublished confidential business information
<u>Other</u>	Updated: 11/07/2003

2.2 Acute Toxicity to Algae

Robust Summary 18-ALG-1

Robust Summary 18-Al Test Substance	20-1
CAS#	27247-96-7
Chemical Name	Nitric acid, 2-ethylhexyl ester
Remarks	Test material purity: 99.9%
Method	
Method/Guideline followed	OECD Guideline for Testing of Chemicals #201 Alga Growth Inhibition Test (1984); EEC Directive 92/69 Method C.3 (1992)
Test Type	Static acute toxicity test
GLP (Y/N)	Y
Year (Study Performed)	1998
Species/Strain	Selenastrum capricornutum (CCAP 278/4)
Element basis (# of cells/mL)	Approximately 10,000 cells/mL
Exposure period/duration	72 hours
Analytical monitoring	None
Statistical methods	The area under the growth curve and the average specific growth rate were determined.
Remarks field for test conditions (fill as applicable)	Individual test concentrations were prepared for each test level. A measured volume of test material was added to a measured volume of test media and stirred for 10 to 18 minutes. A 72-hour sealed static test was carried out in 250 mL Erlenmeyer flasks filled with 50 mL of test solution. Three flasks were prepared for each test concentration and the control. Control flasks containing algal growth medium only. Test chambers were sealed and incubated. The flasks were shaken throughout the study. The pH was determined at time 0 and at 72 hours. Air temperature in the test incubator was monitored throughout the study. Cell counts were made at the start of the study and then at approximately 24-hour intervals. PH was determined for each culture at study start and at approximately 72 hours. Test Levels: Control, 1.0, 10 and 12.5 mg/L (limit of solubility).
Results	The 72-hour No Observed Effect Concentration, based on growth rate and growth inhibition, was 12.6 mg/L, the highest concentration tested.
Remarks	The effective initial concentrations, which induce 50% inhibition as, determined by comparison of area under the growth curve and comparison of growth rates were determined. No significant cell growth or growth rate inhibition was recorded during the 72-hour test period up to 12.6 mg/L of test substance. The no observed effect concentration was defined as the concentration of test substance,

	which induced less than	25% inhibition.	
	The 72-hour loading rates which resulted in 50% reduction in culture growth based on areas under the growth curves and average specific growth rates were both >12.6 mg/L.		
	The highest No Observe	ed Effect Level was 12	.6 mg/L .
	Test Substance	72 Hour	72 Hour
	Concentration	% Inhibition Cell	% Inhibition Growth
	(mg/L)	Growth	Rate
	0	-	-
	1.0	20	6
	10.0	14	2
	12.6	0	0
	pH range 7.05-7.20		
<u>Conclusions</u>	The 72-hour No Observ	red Effect Concentration	n, based on growth rate
	and growth inhibition, was 12.6 mg/L, the highest concentration		
	tested.		
Data Quality	Reliable with restriction	n, restriction due to the	lack of analytical
	confirmation of dose concentration.		
References	Confidential business information.		
<u>Other</u>	Updated: 10/31/2003		

3.0 Toxicity

3.1 Acute Toxicity

3.1.1 Acute Oral Toxicity

Robust Summary 18-Acute Oral -1

<u>Test Substance</u>	
CAS#	CAS# 27247-96-7
Chemical Name	Nitric acid, 2-ethylhexyl ester
Remarks	Test material dosed as received, purity not provided.
Method	
Method/Guideline	
followed	FHSA 16CFR1500.3
Test Type	Acute oral toxicity
GLP (Y/N)	N
Year (Study Performed)	1978
Species/Strain	Rats/ Sprague-Dawley strain
Sex	Male/Female
No. of animals/dose	5/sex
Vehicle	None
Route of administration	Oral (intragastric)
Dose level	10 mL/kg
Control group included	No
Remarks field for test	A single dose of the test material was administered intragastrically to
conditions	five male and five female rats. The animals were observed for signs of toxicity during a 14-day observation period. All surviving animals were euthanized at the conclusion of the observation period. Gross necropsies were performed on all animals after 14 days.
Results	LD50 > 10 mL/kg (males and females)
Remarks	Two males and one female died during the observation period. No
	other signs of toxicity were noted. There were no gross lesions observed during necropsy.
<u>Conclusions</u>	The test article, when administered to male and female Sprague-
	Dawley rats, had an acute oral LD50 of >10 mL/kg.
<u>Data Quality</u>	Reliable without restriction (Klimisch Code).
<u>References</u>	Unpublished confidential business information
<u>Other</u>	Updated: 6/05/2003

3.1.2 Acute Dermal Toxicity

Robust Summary 18-Acute Dermal-1

Test Substance	
CAS#	CAS# 27247-96-7
Chemical Name	Nitric acid, 2-ethylhexyl ester
Remarks	Test material dosed as received, purity not provided.
Method	
Method/Guideline	
followed	Similar to OECD Guideline 402; FHSA Section 191.12
Test Type	Acute dermal toxicity (Limit Test)
GLP (Y/N)	N
Year (Study Performed)	1978
Species/Strain	Rabbits/Albino
Sex	Not specified
No. of animals	4
Vehicle	None
Route of administration	Dermal
Dose level	5 mL/kg
Control group included	No
Remarks field for test conditions	This study was conducted prior to the development of Test Guideline 402. This study deviated from Guideline 402 in that the skin of all treated animals was abraded prior to dosing. In addition the guideline calls for the evaluation of five males and five females using at least one dose level. This study was conducted using two males and two females. Given the high dose level tested during this study and the lack of any mortality, these deviations were not considered sufficient to disqualify this study. Prior to topical application of the test material, the hair on the abdomen of each animal was closely clipped. The skin of all treated animals was abraded prior to dosing. A single dose of 5 mL/kg of the undiluted test material was administered dermally to the abraded skin of all animals. The test material was kept in contact with the skin for a period of 24 consecutive hours under a rubber dam. The application
	site was washed with warm water and wiped clean of residual test material at the end of the 24-hour exposure period. The animals were observed for 14 days after treatment.
Results	LD50 > 5 mL/kg
Remarks	All animals survived the duration of the study. No signs of toxicity were observed.

Conclusions	The test article, when administered dermally as received to four albino
	rabbits had an acute dermal LD50 of greater than 5 mL/kg.
Data Quality	Reliable with restriction (Klimisch Code). Restriction due to the fact
	that the study design differs from the referenced guideline. However
	given the high dose level tested (5 mL/kg) and the lack of mortality the
	study was considered valid and appropriate for review.
References	Unpublished confidential business information
<u>Other</u>	Updated: 6/05/2003

3.3 Repeated Dose Toxicity

Robust Summary 18-Repeat Dose-1

Test Substance	
CAS#	CAS# 27247-96-7
Chemical Name	Nitric acid, 2-ethylhexyl ester
Remarks	>99%
Method	
Method/Guideline	Similar to OECD 412
followed	
Test Type	14-day inhalation toxicity studies in rats with 2 week recovery periods
GLP (Y/N)	Not Specified
Year (Study Reported)	1987
Species	Rat
Strain	Sprague-Dawley CD, 8 weeks of age at initiation of treatment
Route of administration	inhalation, nose only exposure
Duration of exposure	6 hours/day
Doses/concentration levels	0, 14, 42, 150 ppm (Study I)
	0 (unexposed), 0 (chamber room air exposed), 4.3, 42, 420 ppm (Study II)
Sex	Male
Frequency of treatment	5 days/week for 2 weeks
Control and treatment	10 male rats/group (5/group sacrificed after 10 th exposure; 5/group held for 2
groups	week recovery period) (Study I)
	10 male rats/group (5/group sacrificed after 10 th exposure; 5/group held for 2
	week recovery period) (Study II)
Post exposure recovery period	2 Weeks
Statistical methods	Methods not specified.
Dose rangefinding study	No
Remarks field for test conditions	Treated animals were exposed to the test material as mixed aerosol and vapor atmospheres generated by passing dry nitrogen through midget impingers containing the test material at the low and intermediate levels and by nebulization at the high level. Heated water baths were used to promote volatilization of the test material in the impingers and heating tape was used to minimize condensation of vapors in the transfer tubes. Vapors or aerosols were mixed with air prior to entry into the 150 L stainless steel exposure chambers. Chamber housed control animals were exposed to room air only. In the second study a control group of 5 unexposed rats was included in order to evaluate the effects of restraint and fasting on hepatic vacuolation. Chamber exposure concentrations were measured by gas chromatography with flame ionization detection at 60-minute intervals. Rats were weighed and observed daily. In Study I overnight urine samples were collected from each rat after the 9 th exposure. After the 10 th exposure, blood samples were collected from each rat for clinical chemistry and hematology analysis. Five rats from each group were

sacrificed for pathological evaluation. Select organs were weighed. After the 14-day recovery period the remaining rats were subjected to the same clinical pathology and microscopic evaluations. Select organs were weighed. A range of tissues was examined microscopically. In the second study similar procedures were followed except clinical pathology parameters were not evaluated and pathology examinations were limited to the liver and kidneys only.

Results

Remarks

Study I

All animals survived until their intended sacrifice. After the 10th exposure, rats from the 150 ppm group exhibited increased hemoglobin and hematocrit values and increased erythrocyte and platelet counts. Mean absolute and relative liver weights were increased compared to controls. Lipid like cytoplasmic inclusions were found in hepatocytes and eosinophilic cytoplasmic inclusions were found in cells of the renal proximal tubules. Following the two-week recovery period mean absolute and relative spleen weights were decreased, clinical pathology was normal and eosinophilic cytoplasmic inclusions were found in cells of the renal proximal tubules.

After ten exposures at 42 ppm mean absolute and relative liver weights were increased compared to controls. Lipid like cytoplasmic inclusions were found in hepatocytes and eosinophilic cytoplasmic inclusions were found in cells of the renal proximal tubules. Following the two-week recovery period mean relative spleen weights were decreased, clinical pathology was normal and eosinophilic cytoplasmic inclusions were found in cells of the renal proximal tubules.

After ten exposures at 14 ppm mean absolute liver weights were increased compared to controls. White blood cell counts were elevated and lipid like cytoplasmic inclusions were found in hepatocytes and eosinophilic cytoplasmic inclusions were found in cells of the renal proximal tubules. Following the two-week recovery period mean organ weights were unremarkable, clinical pathology was normal and eosinophilic cytoplasmic inclusions were found in cells of the renal proximal tubules.

Study II

All animals survived until their intended sacrifice. After the 10th exposure, rats from the 420 ppm group exhibited increased mean absolute and relative liver weights compared to controls. A slight loss of cytoplasmic basophilia in hepatocytes and eosinophilic cytoplasmic inclusions in cells of the renal proximal tubule were noted. Lipid like cytoplasmic inclusions were found in hepatocytes, however the same incidence of inclusions was found in the control. Microscopic evaluations were normal following recovery.

At 42 and 4.2 ppm, lipid like cytoplasmic inclusions were found in hepatocytes, however the same incidence of inclusions was found in the control. Microscopic evaluations were normal following recovery.

Conclusions	Under the conditions of this study inhalation exposure to this test material resulted in an elevation of mean liver weights at 14 ppm and greater. Lipid like cytoplasmic inclusions were found in hepatocytes at all concentrations tested however since unrestrained, nonfasted rats did not exhibit a similar finding the inclusion bodies were considered a physiological response to restraint and were not considered exposure related. At 14 ppm and greater the test material exposures were associated with eosinophilic cytoplasmic inclusions in cells of the renal proximal tubule. This is a common finding in male CD rats and was attributed to protein absorption from the glomerular filtrate. This finding was less severe after recovery and was not considered biologically significant at concentrations of 42 ppm or less. A treatment related polycythemia was observed at 150. The Study Director concluded that the no observed effect level was 42 ppm.
Data Quality	Reliable with restriction (Klimisch Code) Restriction due to the fact that this summary was prepared based on a study abstract and poster presentation. Individual data were not available.
References	The Toxicologist (7) 202; 1987 and poster presented at 1987 Annual Society of Toxicology Meeting
<u>Other</u>	Updated: 6/10/2003

Robust Summary 18-Repeat Dose-2

Test Substance	
CAS#	CAS# 27247-96-7
Chemical Name	Nitric acid, 2-ethylhexyl ester
Remarks	Test material purity not provided.
Method	
Method/Guideline	Federal Register, Volume 43, Number 163 (163.82-2, Subchronic 21 Day
followed	Dermal Toxicity Study)
Test Type	21-day dermal toxicity study in rabbits
GLP (Y/N)	Not Specified
Year (Study Performed)	1981
Species	Rabbit
Strain	Albino White (approximately 2-2.6 kg in body weight at initiation)
Route of administration	Dermal, 5 days/week, to the clipped, abraded and unabraded, dorsal surface.
Duration of test	15 days of treatment
Doses/concentration levels	0, 50 and 500 mg/kg
Vehicle control	No
Sex	Males and females
Frequency of treatment	Once/day, 5 days/week for a total of 15 doses.
Control and treatment	Three intact and three abraded male and female rabbits in the control group and
groups	in both treated groups. An untreated control group was included in the study.
Post exposure observation period	None
Statistical methods	Body weight, food consumption, hematology and clinical chemistry parameters, organ weights and organ/body weight ratios were analyzed. Mean values of all dose groups were compared to control at each time interval. Tests included ANOVA with a Newman Keuls test.
Remarks field for test conditions	The test material was applied to the clipped, abraded or unabraded dorsal surface of the rabbits for 5 days/week for 15 days. Elizabethan collars were used to prevent ingestion. The hair was clipped and shaved from each animal as necessary. The exposed skin of half of the animals was abraded once/week throughout the study. The test material was applied over the clipped area and covered with gauze patches secured in place with surgical hypoallergenic adhesive tape. The trunk of each animal was then wrapped with an impervious material held in place with an elastic bandage. Control animals were handled in an identical manner. After 6 hours the treated areas were wiped gently with corn oil. Clinical observations were made daily. Dermal responses were evaluated daily on dosing days approximately one hour after the completion of the exposure period. Body weight was recorded twice weekly during treatment. Food consumption was estimated every 3 to 4 days during the study. Hematology and clinical chemistry parameters were evaluated pretest and at termination of treatment. Macroscopic examinations were performed on all animals. Select organs were weighed. Microscopic examinations were conducted for all animals. The following tissues were evaluated: treated and untreated skin, gross lesions, brain, heart, liver, spleen, kidneys, urinary

	bladder, ovaries, testes, adrenals, thyroid, stomach, mesentery, small and large intestine and cecum.
Results	
Remarks	Two animals died prior to study termination. These included one high dose female (on day 5) and one low dose male (on day 21). The low dose death was attributed to pneumonia. The cause of the high dose death was not determined. All of the remaining control and treated animals survived the duration of the study.
	Dermal irritation was observed in both test material treated groups. Erythema and eschar formation and edema ranging from well defined to severe were observed in males and females at both dose levels at both intact and abraded dose sites. Findings in the high dose males were more severe than in the low dose males. A dose response was not clearly evident in the females. No significant dermal findings were observed microscopically.
	There were no consistent differences exhibited in mean body weight between the treated and control animals. Food consumption was generally unremarkable in all groups throughout the study. The clinical laboratory, organ weight and microscopic data were also generally unremarkable.
	Based on the in life dermal findings observed in the low dose males and females, a no observed adverse effect level for local effects was established.
Conclusions	Based upon systemic toxicity, a NOEL of >500 mg/kg was established for this study.
Data Quality	Reliable with restriction (Klimisch Code) Restriction due to the lack of correlation between in life dermal findings and microscopic findings of the skin.
References	Unpublished confidential business information
<u>Other</u>	Updated: 12/2/2003

Robust Summary 18-Repeat Dose-3

Robust Summary 18-Re Test Substance	peut Dose V
CAS #	CAS# 27247-96-7
Chemical Name	Nitric acid, 2-ethylhexyl ester
Remarks	100%
Method	
Method/Guideline followed	Japanese Guidelines for Screening Toxicity Testing Chemicals (Notifications Kanpogyo No. 39, Yakuhatsu No. 229 Kikyoku No. 85 (1984)
Test Type	28-day oral toxicity study in rats
GLP (Y/N)	Y
Year (Study Performed)	1989
Species	Rat
Strain	SD[Crj: CD(SD), SPF], 4 weeks of age at receipt
Route of administration	Oral gavage (syringe and dosing tube)
Duration of test	28 days of treatment plus 14 days of recovery
Doses/concentration levels (dose volume)	0, 20, 100 and 500 mg/kg/day (10 ml/kg)
Vehicle	0.5% Tween 80
Sex	Males and females
Exposure period	28-day treatment duration
Frequency of treatment	7 days/week
Number of	6 rats/sex/group for 28 day sacrifice
animals/sex/group	6 rats/sex in control and high dose for 14 day recovery period
Post exposure observation period	14 days in control and high dose groups
Chemical Analysis	Chemical analysis of dosing solutions was conducted by the sponsor and confirmed dosing suspensions were stable for 10 days.
Statistical methods	Student's t-test, Welch's t-test, Armitage's chi square test.
Dose rangefinding study	Yes (acute study and 10 day toxicity study)
Remarks field for test conditions	Single oral doses were administered for 28 consecutive days using a gavage needle. Clinical observations were performed daily. Body weights were recorded prior to the first dose and weekly thereafter. Food consumption was measured weekly. Hematology, clinical chemistry and urinalysis determinations were conducted prior to the 28 day and recovery sacrifices for all survivors. Macroscopic examinations were performed on all animals. The brain, liver, kidney, adrenal, testis and ovary were weighed. A range of tissues was examined microscopically. These included the heart, liver, spleen, kidney and adrenals from all control and high dose animals, the kidney from all low and mid dose animals sacrificed at 28 days and gross lesions from all groups. The kidneys were examined for all animals at recovery.
Results	
Remarks	All of the treated animals survived the duration of the study. Post dosing salivation was observed in the high dose males and females

during the second week of study and thereafter. Predosing salivation was also observed in the high dose females. Salivation was not observed during recovery.

A statistically significant decrease was observed in the mean body weight of the high dose females during the last week of treatment and during the first week of recovery. A statistically significant decrease was observed in the mean food consumption of the high dose females during the last week of treatment but not during recovery.

Following 28 days of treatment the high dose males exhibited a statistically significant increase in mean platelet number. No other treatment related changes were observed in the hematology data. The high dose females exhibited a significant increase in urea nitrogen and a significant decrease in chloride following 28 days of treatment but not following recovery.

A number of alterations were observed in the urinalysis data of mid and high dose 28 day sacrifice animals, these included: a significantly acidic urinary pH in high dose males and females; a significant increase in protein, ketone bodies, urobilinogen, volume, potassium and chloride in high dose males and females; a significant increase in ketone bodies in the mid dose females; and a significant increase of epithelial cells in the urine sediment of the mid and high dose females. In the high dose recovery females significant decreases in sodium, potassium and chloride were observed.

Following 28 days of treatment significant increases were observed in the absolute and relative liver and kidney weights of the high dose males and in the relative liver and kidney weights of the high dose females. Increased relative adrenal weights were also observed in the high dose females. Following recovery relative kidney weights were increased in the high dose males.

At the 28 day necropsy enlarged livers were observed in the mid dose males and high dose males and females. Enlargement of the kidneys was observed in the high dose males. Following recovery enlarged kidney was observed in one high dose male.

Microscopic changes observed in the kidney of the mid and high dose males included the appearance of hyaline droplets in the proximal tubular epithelium and regenerative changes of the renal tubules. The regenerative change was also observed in one high dose recovery male. None of these effects were observed in the females. There were no significant histological effects in the liver.

Conclusions	The Study Director concluded that the no observed effect level for
	systemic toxicity was 20 mg/kg/day.
Data Quality	Reliable with restriction (Klimisch Code)
References	Unpublished confidential business information
<u>Other</u>	Updated: 10/17/2003

Genetic Toxicity:

Robust Summary 18-Gentox:-1

Test Substance		
CAS#	CAS# 27247-96-7	
Chemical Name	Nitric acid, 2-ethylhexyl ester	
Remarks	Test material purity not specified.	
Method		
Method/Guideline followed	Similar to OECD Guideline 471	
Test Type	Bacterial Reverse Mutation Assay	
GLP (Y/N)	N	
Year (Study Performed)	1978	
Test System	Salmonella typhimurium	
Strains Tested	Salmonella typhimurium tester strains TA98, TA100, TA1 TA1538	535, TA1537,
Exposure Method	Plate incorporation	
Test Substance Doses/concentration levels	0.1% solution (v/v) in DMSO: 0.001, 0.005, 0.01, 0.05	, 0.1ul/plate
Metabolic Activation	With and without (0.5 ml of S9 fraction mix of livers of pretreated Sprague Dawley rats)	of Aroclor 1254
Vehicle	Dimethylsulfoxide (DMSO)	
Tester strain, activation	TA98 +S9 Aflatoxin B1	1.0
status, Positive Controls	ug/plate	
and concentration level	TA98 -S9 2-nitroflourene	5.0
	ug/plate	
	TA100 +S9 Aflatoxin B1	1.0
	ug/plate	
	TA100 -S9 N-methyl-N-nitro-N-nitrosoguan	idine 50
	ug/plate	
	TA1535 +S9 2-aminoanthracene	5.0 ug/plate
	TA1535 -S9 N-methyl-N-nitro-N-nitrosoguan	
	ug/plate	2.0
	TA1537 +S9 2-aminochrysene	1.0 ug/plate
	TA1537 -S9 9-aminoacridine	100 100
	ug/plate	100
	TA1538 +S9 2-aminofluorene	2.0
	ug/plate	2.0
	TA1538 -S9 2-nitroflourene	5.0
		3.0
Wahiala Cantinal	ug/plate Directly levifest de (DMSO) 100 y1/rlete	
Vehicle Control	Dimethylsulfoxide (DMSO) 100 ul/plate	
Statistical Analysis	Mean revertant colony count and standard deviation w	
	for each dose point. Linear regression analysis was us	ed to compute

	the best-fit line of dose response.
Dose Rangefinding Study	No
S9 Optimization Study	Yes
Remarks field for test conditions	This study was conducted in 1978, prior to the adoption of OECD Test Guideline 471. In addition to the tester strains used during this study, the OECD Guideline suggests the inclusion of tester strains <i>E.coli</i> WP2 uvrA, or WP2 uvrA (pKM101) or <i>Salmonella typhimurium</i> TA102. This study included the use of tester strain TA1538. OECD 471 does not incorporate this strain. These deviations from the test guideline are not considered major study deficiencies. In the main study there were two treatment sets for each tester strain, with (+S9) and without (-S9) metabolic activation. Each of the tester strains was dosed with five concentrations of test substance, vehicle control, and a positive control. Three plates/dose group/strain/treatment set were evaluated. Test material, positive control or vehicle control were added to each plate along with 0.1 ml of tester strain, and S9 mix (if needed). This was overlaid onto the surface of supplemented Noble's agar in a screw-capped tube. Tubes were mixed and poured over a base plate of Spizzizen's minimal medium. Plates were incubated for 48 hours at 37°C.
Results	The test substance was not genotoxic in this assay with or without metabolic activation.
Remarks	In this mutagenicity assay all data were acceptable and no positive increases in the number of revertants/plate were observed with any of the tester strains with or without metabolic activation. The positive control for each respective test strain exhibited at least a 3-fold increase (with or without S9) over the mean value of the vehicle control for a given strain, confirming the expected positive control response. For each strain, the numbers of revertant colonies in negative control plates were within acceptable limits as defined by historical control data for spontaneous revertants. Sterility controls were negative.
<u>Conclusions</u>	Under the conditions of this study, the test material was not mutagenic.
Data Quality	Reliable without restriction (Klimisch Code)
<u>References</u>	Unpublished confidential business information
<u>Other</u>	Updated: 6/06/2003